Mr. David B. Howekamp
Director of Air Management Division
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Howekamp:

The District has completed revisions to the following proposed Major Facility Review Permits, pursuant to U.S. EPA Region IX comments in a letter dated January 31, 1997, and discussions between staff from Region IX and the District held March 5, 1997:

BAAQMD #	Plant Name	City
A0023	General Chemical	Richmond
A0083	U.S. Pipe & Foundry	Union City
A0575	Acme Fiberglass	Hayward
A0591	East Bay M.U.D.	Oakland
A0733	City of Sunnyvale	Sunnyvale
A1209	Union Sanitary	Union City
A1403	City of Santa Rosa	Santa Rosa
A2300	Fleischmanns Yeast	Oakland
A3523	Universal Foods	Oakland
A7974	Western Fiberglass	Santa Rosa

Enclosed for your review and approval are: 1) a formal written response to objections and comments raised in a letter from U.S. EPA Region IX to the District, dated January 31, 1997; 2) evaluations describing how the District has revised each proposed permit; 3) copies of the ten proposed permits; and 4) source test data for Plant #A0083.

In addition to sending this communication in hard copy format, this letter and all enclosures but #4 will be sent via Lotus Notes. The District will count the 45 day EPA review period from the date of this letter, which will be the same date it is sent electronically. If we hear nothing further, we will issue the final permits upon completion of your 45 day review period. If you have any questions regarding this project, please call Janet Stromberg, Supervising Air Quality Engineer, at (415) 749-4716.

Very truly yours,

Ellen Garvey
Air Pollution Control Officer

Enclosures

cc: California Air Resources Board (w/all enclosures)
Each Facility (w/general and facility specific enclosures)

Enclosure #1

BAAQMD Response to U.S. EPA Comments of January 31, 1997, on

Ten Proposed BAAQMD Major Facility Review Permits

I. BASES FOR U. S. EPA OBJECTION

1. Minor Permit Modification Procedure

EPA Comment: "All ten proposed permits contain minor permit modification language that is not allowed by District Rules and Regulations or federal law. The minor permit modification procedure listed in the Standard Conditions of each proposed permit would among other things remove EPA's 45-day review for all minor permit modifications as well as removing EPA's ability to object to permit revisions below certain de minimis levels. The entire proposed procedure is in direct conflict with 40 CFR Part 70, and with District Rules and Regulations. This procedure must be removed from the proposed permits, and replaced with the legally binding procedure for permit modifications according to Part 70 and the District's approved Part 70 program."

District Response: The revised minor permit modification procedures have been deleted from the permits. The District will implement the minor modification procedures specified in Regulation 2, Rule 6, Major Facility Review.

2. Periodic Monitoring

EPA Comment: "The second basis for our objection is that with the exception of Acme Fiberglass and Western Fiberglass, the proposed permits do not contain periodic monitoring as required in the permit content provisions of both the District's and EPA's operating permit rules. District Regulation 2-6-409.2 states, in part: "Where the applicable requirement does not require periodic monitoring or testing, the permit shall contain periodic monitoring sufficient to yield reliable data from the relevant time periods that is representative of the source's compliance with the permit." The District regulation is based on 40 CFR §70.6(a)(3)(i)(B), and on Sections 503 and 504 of the Clean Air Act, which require that Part 70 permits contain "conditions as are necessary to assure compliance with applicable requirements," and "monitoring, compliance certification, and reporting requirements to assure compliance with the permit terms and conditions."

District Response: The District does not agree with the statement: "... the proposed permits do not contain periodic monitoring as required in the permit content provisions of both the District's and EPA's operating permit rules." The proposed permits include requirements for a substantial amount of monitoring to determine compliance with federally enforceable emission limits and standards applicable to sources at the facilities. However, the District did not submit an analysis of the existing monitoring with the proposed permits. Monitoring analyses have now been prepared for each of the ten proposed permits. They are included in section III, Facility Evaluations, of this attachment.

In determining if additional monitoring is justified at this time, the District has taken as a starting point the most recent information available on EPA's draft Compliance Assurance

Monitoring (CAM) rule. It is our understanding that EPA intends the CAM rule to be the document that sets forth guidance and requirements for periodic monitoring in Title V permits. It is our further understanding that EPA plans to phase in CAM requirements, with full implementation of all CAM requirements to occur when the permits are renewed after the first five years. With all the uncertainties that exist in this new program, we believe this is a very wise approach. Therefore, in analyzing emission limits for which additional monitoring might be warranted in the initial round of permitting, the District is focusing on equipment with emissions over the major source thresholds. Should the final CAM rule include requirements for smaller emission sources, the District will add monitoring requirements as necessary when the permits are renewed or reopened for other reasons.

II. GENERAL COMMENTS APPLICABLE TO ALL PROPOSED PERMITS

1. Standard Conditions Section

a. Administrative Requirements

EPA Comment: "The dates in the parentheses should be clarified (i.e., adopted by District on .... or approved by EPA on....). Also, many of these dates may be incorrect. For example, the date listed with SIP Regulation 1 (3/17/82) may not be correct since several of these provisions were approved into the SIP prior to 1982, and for Regulation 2, Rule 1, EPA's approved version dates back to 1981. Please make sure that these dates actually match the dates for the SIP-approved versions."

District Response: The District will correct dates that were cited incorrectly.

b. Conditions to Implement Regulation 2, Rule 6, Major Facility Review

EPA Comment: "The first condition paraphrases District Regulations 2-6-404.2 and 409.6. The permit should instead use the same language as the rules. In the second condition, the origin and authority should cite 2-6-307 rather than 2-6-409.7. The seventh condition under this heading should read 'the permit holder shall supply within 30 days any information...' The eighth condition would be more accurate if it mentioned that confidential material handled by EPA will be subject to 40 CFR Part 2."

District Response: The District has made these changes to the permits.

c. Records

EPA Comment: "The 5-year record retention requirement in §70.6(a)(3)(ii)(B), while applied correctly in the Standard Conditions, is inconsistently applied throughout many of the permits. For example, in General Chemical's permit, Section V.A., Conditions #7606 #5, #13215 #4, #12051 #3, and several other conditions specifically require that records be kept for 2 years or 24 months. While the Standard Condition requires that all records be kept 5 years, these frequent references to shorter record retention periods throughout the permit are confusing. If the District wishes to specify record retention requirements throughout the permit, 5 years should be

consistently specified. The origin and authority in these cases should reference both the rule with the shorter record retention requirement and the Part 70 or District rule 5-year requirement. The 5-year requirement supersedes, and assures compliance with, any shorter record retention requirements."

District Response: The District has revised existing permit conditions to require records to be kept for five years.

d. Monitoring Reports

EPA Comment: "Standard permit conditions must include the requirement for prompt reporting of non-compliance, as described in the Manual of Procedures (MOP) Vol. II Part 3, Section 4.7, to be consistent with §70.6(a)(3)(iii)(B). The MOP requires reporting non-compliance within 10 days of discovery and requires a written report be submitted within 30 days."

District Response: The District has added this requirement to the permits.

e. Compliance Certification

EPA Comment: "The compliance certification language is incomplete for all permits because it does not include the detailed annual compliance certification requirements outlined in the last paragraph of Section 4.5 of the MOP. Please cite MOP Section 4.5 and include the full language in the permit in order to clarify the source's obligation to provide certain information in the annual compliance certification."

District Response: The permits have been revised to clarify this requirement.

f. Schedule of Compliance

EPA Comment: "The District Rules require each permit to include a schedule of compliance under Regulation 2-6-409.10. Further, Volume II, Part 3, Section 4.5 of the MOP also states that the permit will require the plant to submit a progress report at least every six months if the plant has a compliance schedule that obligates the plant to take some action. Please include this requirement in all permits as required by your rules and cite MOP Section 4.5 and Regulation 2-6-409.10. Two examples of permits that are apparently lacking compliance schedules and semi-annual progress report requirements are U.S. Pipe and Foundry and Acme Fiberglass, which each listed non-complying emission units in their permit applications. Neither of these proposed permits, however, include a compliance schedule. The permits must contain these elements as required by the approved Title V program to ensure sources are aware of their compliance obligations."

District Response: Compliance Schedules have been added to the permits.

g. Acid Rain

EPA Comment: "The standard permit conditions for acid rain provisions are not included. While none of these sources are acid rain sources, please note for the future

that these standard terms and conditions will have to be included for acid rain sources, as required by §§70.6(a)(1)(ii) and (a)(4) and District Regulation 2-6-409.15**."**

District Response: So noted.

h. CAA Section 112(r)

EPA Comment: "The District did not include permit conditions for sources subject to the requirements under 112(r). The following language could be used to meet this applicable requirement. When the owner or operator knows the source is already subject to Part 68 provisions, the permit language should be:

> "This stationary source, as defined in 40 CFR §68.3, is subject to 40 CFR Part 68. This stationary source shall submit a risk management plan (RMP) by the date specified in §68.10. This stationary source shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70.

"When the source owner or operator believes the source could be subject to the rule in the future or wants flexibility to preclude a permit reopening, the permit language should be:

> "Should this stationary source, as defined in 40 CFR §68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in §68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70."

District Response: The former suggested language has been added as a standard condition to the permits for facilities that are known to be subject 40 CFR part 68. The latter suggested language regarding possible future applicability will not be added to permits. If facilities become subject in the future, we will amend the permits as necessary.

2. Generally Applicable Emissions Requirements Section

a. Table Title

EPA Comment: "EPA recommends changing the heading for Part III of all permits to ~~General~~ Plant Wide Applicable ~~Emission~~ Requirements because the generally applicable requirements listed include other requirements in addition to emission requirements."

District Response: The requirements on Table III also apply to point sources that are exempt from the requirement to obtain a permit. We agree that the name of the table should be changed. We suggest "General Applicable Requirements." We are also proposing changes to the explanatory text to clarify the meaning of the table.

b. Introductory Text to Table

EPA Comment: "The introductory paragraph for this section states that the conditions would not be violated under normal, routine operations and that no additional periodic monitoring or reporting to demonstrate compliance is warranted. EPA believes that some of the generally applicable requirements may need periodic monitoring. As discussed in our cover letter, EPA objects to the lack of periodic monitoring for the unit specific requirements - not the generally applicable requirements described here. Please provide, as required by §70.6(a)(3)(i), periodic monitoring requirements sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit. Alternatively, as discussed in EPA's White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program (White Paper 2" dated March 5, 1996), the District could show that the establishment of a regular program of monitoring would not significantly enhance the ability of the permit to assure compliance with generally applicable requirements.

District Response: The existing explanatory text for Table III already says "in cases where a requirement, in addition to being generally applicable, is also specifically applicable to one or more sources, the requirement and the source are also included in Part IV, Applicable Requirements of this permit." We think this addresses EPA's concern. We believe exempt sources will not require any additional periodic monitoring, and that the requirements applicable to exempt sources are appropriately listed in Table III.

c. Cross-referencing

EPA Comment: "Table III (as well as Tables IV, VI, and VII of the permit) heavily relies on summaries and cross-referencing. There are several issues regarding the extent to which the District uses tables and cross-referencing in the permit. White Paper 2 provides guidance on the extent to which use of this technique would be appropriate in a Title V permit. While cross-referencing may be a useful tool for writing concise permit conditions which incorporate lengthy test methods or monitoring procedures by reference, the permit content requirements of §70.6 must still be met. One of the primary benefits of a Title V permit is that all applicable requirements are incorporated into one document enabling a source to easily determine its regulatory obligations. White Paper 2 states that "Permitting authorities should therefore balance the streamlining benefits achieved through use of incorporation by reference with the need to issue comprehensive, unambiguous permits useful to all affected parties, including those engaged in field inspections." We are concerned that, because of the extent to which the District uses cross-referencing, the permit is not a stand-alone document that a source or inspector could use to determine the actual requirements that a source must comply with on a daily basis.

"Under White Paper 2, it was intended that, to meet the requirements of the Clean Air Act and Part 70, the emission limits for each unit covered by the permit be given in full. Additionally, emission limits and other requirements should not be paraphrased, because of the potential for creating dual requirements. In order to meet the

requirements of Part 70, the District must include in Tables III, IV, VI and VII, at a minimum, the full language for each emission limit, including averaging time and other information necessary to understand the limit.

"Where the SIP-approved and District rule emission limits differ, both emission limits must be given in full. In order for the full benefits of Title V to be realized, we encourage the District to state day-to-day requirements in the permit, and to limit cross-referencing to requirements such as monitoring procedures and protocols where the source's ability to comply and everyone's ability to comprehend is not hindered by lack of complete information in the permit."

District Response: District staff believe that the comprehensive citation of all applicable requirements is the most unambiguous approach. The permit includes all permit condition text. Inspectors always have a complete set of District regulations with them, and they have laptop computers that enable them to reach the District database which has all the text of applicable District and federal regulations. In addition, District and federal rules and regulations are readily available to operators and the public. We agree that the SIP is less readily available because EPA has not yet produced it in an electronic format. We therefore agree to attach portions of the SIP that are applicable to each facility as an appendix to each permit.

There is no way to write permit conditions for regulatory requirements without paraphrasing, because the syntax of regulatory language is not appropriate for permit conditions. The District is developing the capability to issue these permits electronically. In five years, we will have the ability to include all regulatory language in a hypertext format 'behind' each citation. We are working on this. The present version of the permits is the first stage. We believe the language in both our Title V regulation 2, Rule 6, and in the MOP Volume II, Part 3 allow us to do this, since there is a reference to a "listing" of all applicable requirements.

The federal Clean Air Act, 40 CFR part 70, and District Regulation 2, Rule 6, each make no distinction for presentation requirements between applicable requirements that are emission limits versus other applicable requirements such as record keeping. We believe there is a difference between a citation of an applicable requirement (Tables in Part IV) and cross referencing information (Tables in Parts VI and VII).

With the exception of the list of test methods, which are in a separate table (Part VII), all applicable requirements for permitted sources (emission units) are listed in the tables in Part IV, Applicable Requirements. These tables are the crux of the permit, the place where the District believes it is satisfying the basic requirement of part 70 to be comprehensive. The tables in Part VI, Applicable Emission Limits and Monitoring Methods provide added emission limit details (originally cited in Part IV) and cross referencing to monitoring requirements (originally cited in Part IV). The Part VII table cross references test methods with the emission requirement citations from Table IV.

We are willing to revisit and perhaps expand on the expression of the emission limits in Part VI. However, it is impossible not to paraphrase emission limits from 40 CFR

part 60, since this regulation itself makes use of cross referencing so extensively. It is impossible to state some NSPS emission limits as they are written in the regulation in a way anyone can understand. The District has not yet reviewed a permit from another agency that does not paraphrase these regulatory requirements. We believe our approach minimizes paraphrasing.

d. Table Headings

EPA Comment: "Tables III, IV, and V. The language heading for these tables, in most cases, does not make it clear that the purpose of the tables is to list requirements which apply to these sources. The table should include practically enforceable language, to the effect that the requirements listed in the table apply to the source, and that the source must comply with these requirements. The language "The permit holder shall comply with the applicable requirements specified in the BAAQMD and SIP Rules and Regulations cited below," which is included with some of the tables, should be expended and included for all tables as follows: 'The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below.'"

District Response: The suggested language has been added to the permits.

e. Identification of Federally Enforceable Requirements

EPA Comment: "The permit does not clearly identify the terms and conditions of the permit which are not federally enforceable. The column titled SIP-approved/FE is confusing because a requirement (e.g., NSPS) may be federally enforceable without having been approved into the SIP. EPA recommends separate columns for designating SIP and federally enforceable conditions."

District Response: The reference to "SIP approved" has been deleted from the permits. SIP requirements are clearly identified and all requirements are simply identified as federally enforceable or not.

f. Citation of Approval Dates

EPA Comment: "All applicable requirements must be included in the permit. If a rule is listed, but the correct SIP-approval date is not listed, then in effect, the applicable requirement has not been listed. We are concerned that, in addition to failing to explicitly include the full emission limit (see comment I.2.c., above), the District has frequently given the incorrect date of each rule's SIP approval. Taken together, this means that the permits fail to list all applicable requirements. For example, in Table III, the District has identified the rules "General Provisions and Definitions," "Air Pollution Episode Plan," and "Open Burning" as "SIP approved/FE," which is correct. However, the dates in the parenthesis next to these rules are not the SIP approval dates. In another example, in Acme Fiberglass' permit, the dates given in Table III are mostly inaccurate, for example:

BAAQMD Regulation 1	Approved various dates between '80-'82, not 11/3/93 as cited.

BAAQMD Regulation 4	Approved 2/7/89, not 3/20/91 as cited.
BAAQMD Regulation 5	Approved various dates (6/2/80, 7/30/81, 6/22/81, 8/6/82, 10/27/83), not 11/2/94 as cited.
BAAQMD Regulation 6	Approved various dates (6/2/80, 7/10/80, 10/27/83), not 12/19/90 as cited."

District Response: As agreed upon by EPA and the District at a meeting on March 5, 1997, the District has added language to the text for each table clarifying that the SIP citation means the SIP as it has been cumulatively 'approved by EPA through' a specified date. We think one date (the most recent approval date) per requirement is sufficient. For current District rules, the date is the most recent Board action date, because when the Board approves an amendment to a rule, it reapproves the entire rule. For SIP approved rules, it should be the most recent EPA approval date. This date means that the approved rule is inclusive of all provisions that have been approved as of that date. Adding all the intermediate approval dates clutters the permit and does not help users. It is necessary to make this distinction because EPA action on an amendment to a rule only refers to approval of the amendment, not the entire rule as approved to date.

g. Origin and Authority for Permit Conditions

EPA Comment: "The permit citations for origin and authority are not consistently included for each permit condition, as required under §70.6(a)(1)(i). For example, General Chemical's permit, V.A. Condition #7934, #1, lists 'basis: cumulative increase' as the origin and authority. Presumably, the origin is District permit # 7934. However, Part 70 requires that the "authority" of the condition, rather than the "basis" be listed."

District Response: Definitions of "basis" and "cumulative increase" have been added to the glossary.

3. Applicable Requirements Section

EPA Comment: "For all permits please change the title of Section IV, "Applicable Requirements," to read, Unit-Specific Applicable Requirements. See also comments I.2.c. and I.2.d. above."

District Response: The title of Section IV. has been revised to "Source Specific Applicable Requirements" pursuant to District terminology wherein permitted emission units are defined as sources.

4. Applicable Emission Limits & Compliance Monitoring Requirements Section

a. Cross-referencing for compliance monitoring requirements

EPA Comment: "Please note that, in addition to the emission limits (see comment I.2.c.), Part 70 also requires that clear requirements for monitoring, recordkeeping, and reporting be included in the permit:

> "'...section 504(c) requires each permit to 'set forth inspection, entry, monitoring, compliance certification, and reporting requirements to assure compliance with the permit terms and conditions.' Analogous provisions are contained in §§70.6(a)(1) and (3). The EPA interprets these provisions to place limits on the type of information that may be referenced in permits. Although this material may be incorporated into the permit by reference, that may only be done to the extent that its manner of application is clear.'

"Please insure that the monitoring and recordkeeping requirements in the permit provide enough detail so that the permit will be a comprehensive, stand-alone document which will allow the source and other parties to determine the actual requirements that a source must comply with on a daily basis."

District Response: We believe the permits comply with the requirements of the District's Title V program as approved by the District Board and by EPA. (See response to II.2.c. above.) It was agreed at the March 5, 1997, meeting between U. S. EPA Region IX and the District, that the text of all regulatory requirements, except the SIP, is readily available and that the proposed citations satisfy program requirements.

b. Monitoring Frequency

EPA Comment: "Where "P" is listed for periodic monitoring under "Monitoring Frequency," please also specify the frequency (e.g., daily, weekly, monthly) at which the monitoring must take place.

District Response: The permits have been revised accordingly.

5. Other General Comments

a. References to Plants and Sites

EPA Comment: "The proposed permit seems to interchangeably designate a facility as a "Plant" or "Site". We suggest using only one term consistently."

District Response: The permits have been revised to use the term "facility" consistently.

b. Permit Development Documentation

EPA Comment: "It would be helpful if the District would provide, along with the proposed permit, an engineering analysis to document decisions made in drafting the permit, such as why alternative operating scenarios and permit shield requests in the application were not addressed. Also, documentation will normally be required if the permit incorporates streamlining. Additionally, documentation is useful in showing how periodic monitoring was selected. For example, in San Joaquin's permit templates, they have included an analysis showing whether or not, for each requirement, periodic monitoring is required, and if so, the basis for the monitoring they have selected."

District Response: The District will prepare a cover document for each permit that addresses any variations from the norm such as added periodic monitoring, permit shields for streamlining, non-compliance, and significant differences between information in the application and in the permit.

c. Identification of Standard Conditions

EPA Comment: "EPA recommends numbering the standard conditions and the conditions listed in the Tables to make it easier to refer to the requirements."

District Response: The standard conditions have been numbered.

d. Identification of Party Responsible for Compliance in Permit Condition Text

EPA Comment: "In order to be practically enforceable, all permit conditions must require compliance by the owner or operator rather than the emissions units. For example, condition numbers 2274.5 and 2274.6 in U.S. Pipe and Foundry's permit must refer to the owner/operator of the facility rather than a specific emissions unit or control device.

District Response: The permits have been revised accordingly.

Enclosure #2

Facility Evaluations for

Ten Proposed BAAQMD Major Facility Review Permits

1. General Chemical Corporation, Plant #A0023

a. Proposed Revisions, Plant #A0023

Pages 1-4: The standard condition for facilities subject to 112 (r) has been added.

Page 5: The fuels for S-9 and S-15 have been added.

Page 7: The abatement device list has been corrected to show that A-1 abates SO2 emissions, and A-2 abates SO3 and acid emissions.

Pages 8-10: The rules in the General Applicable Requirements table have been changed to one-line citations. The specific citations for permitted sources have been added to the Source-Specific Applicable Requirements section.

Pages 11-26: Source-Specific Applicable Requirements: Specific requirements in Regulation 6, Regulation 9, Rules 1 and 2, and Regulation 12, Rules 6 and 10, have been added to this section.

Pages 15-16: The low fuel usage requirements have been deleted from the S-9, Process Heater, table.

Page 18: 8-7-308, Operating Practices, has been added to the S-14, Gasoline Dispensing Facility, table.

Pages 19-20: The low fuel usage requirements have been deleted from the S-15, Process Heater, table.

Page 25: SIP 9-1-308, Emissions Limitations from Sulfuric Acid Plants has been deleted for the S-24, Electronic Grade Sulfuric Acid Manufacturing Process, because the applicable requirement is 9-1-309, Emissions Limitations from New Sulfuric Acid Plants.

VI. Permit Conditions Table: All two-year recordkeeping requirements have been changed to five-years. The basis for this change, Regulation 2-6-501, was added.

VII. Permit Shield Table: The permit shield from 40 CFR 60.82 and 40 CFR 60.83 was amended to state that the facility has not been modified since 8/17/71, as defined by 40 CFR 60.14. S24, Sulfuric Acid Manufacturing Process, has been deleted from Table VII-A because it is not a sulfuric acid manufacturing process as defined by 40 CFR 81(a) . S24 is not an acid manufacturing process, but rather an acid purification process. Instead, a separate table has been added for S24 to show that it is shielded from 40 CFR 82 and 83 for this reason.

VIII. Emissions Limits & Compliance Monitoring Section: Requirements for Regulation 6, Regulation 9, Rules 1 and 2, and Regulation 12, Rules 6 and 10, have been added to this section just as they have been added to Section IV.

Page 33: The Emissions Limits table for S-1, Sulfuric Acid Manufacturing Process has been amended so that the monitoring type for the BAAQMD Regulation 9-1-301 requirement does not imply that streamlining has been considered.

b. Periodic Monitoring, Plant #A0023

Lack of periodic monitoring sufficient "to yield reliable data, etc." was one of the two main reasons for formally objecting to the District's permits. The District has agreed to add sufficient monitoring to the proposed permits, but is reluctant to anticipate the final requirements in 40 CFR 64. In order to avoid future difficulties, we have decided to impose additional monitoring only in those cases where a source has large emissions and existing federally enforceable emission limits.

In the case of General Chemical, this means that no new monitoring is required at this time. The reason is that the large source—S1, Sulfuric Acid Manufacturing Plant—has a CEM for SO2, which is sufficient monitoring, and the other sources are insignificant.

The District has also performed modeling on S1, Sulfuric Acid Manufacturing Plant, to determine whether S1 is likely to exceed the BAAQMD Regulation 9-1-301 ground level standard. Modeling determined that if S1 emits SO2 continuously at a rate of 300 ppm @ 12% O2 (the true rate is actually about 230 ppm @ 12% 02), the maximum ground level concentration would be only 0.01 ppmv outside the fence line. Therefore, S1 does not require additional ground level monitoring.

Another monitoring issue mentioned in EPA's letter of January 31, 1997, is the use of refinery make gas (RMG) at S9, Process Air Heater. The source has a permit to burn RMG, although it rarely does. Use of RMG would not cause the source to exceed the Regulation 9-1 standards, because the gas comes from Chevron refinery, which has an NSPS limit on the H2S concentration in the gas of 160 ppm.

The details of the monitoring analysis for this facility are in presented on the tables in III.1.c. below.

c. Tables - General Chemical Emissions and Monitoring, Plant #A0023

Sulfuric Acid Manufacturing, Plant #A0023

Source	Pollutant	Emissions tpy	FE Requirement	Monitoring
S1, Sulfuric Acid Manufacturing Plant	SO2	185.00 tpy	SIP 9-1-301	None required. Modeling performed by the District shows that the maximum concentration outside the fence line is 0.01 ppmv.
			SIP 9-1-308.2	CEM
	SO3 and H2SO4 combined	7.54 tpy	BAAQMD 6-320	None required
	TSP	1.11 tpy	SIP 6-301	None required
			BAAQMD 6-310	None required
			BAAQMD 6-311	None required
S24, Electronic Grade Sulfuric Acid Manufacturing Process (integrated with S-1)	SO2	0.04 tpy	SIP 9-1-301	None required
			SIP 9-1-309	CEM
	SO3 and H2SO4 combined	0	BAAQMD 6-320	None required
	TSP	0.01 tpy	BAAQMD 6-301	None required
			BAAQMD 6-310	None required
			BAAQMD 6-311	None required

Gasoline Dispensing Facility, Plant #A0023

Source	Pollutant	Emissions tpy	FE Requirement	Monitoring
S14, Gasoline Dispensing Facility	VOC	0.33 tpy	BAAQMD 8-7-301.2	None required

Particulate Sources, Plant #A0023

Source	Pollutant	Emissions tpy	FE Requirement	Monitoring
S2, Oleum Storage Tank #10	TSP	0.07 tpy	6-301	None required
S3, Alkylation Acid Storage Tank #12	TSP	0	6-301	None required
S5, Oleum Storage Tank #9	TSP	0.26 tpy	6-301	None required
S6, Sulfur Storage Tank	TSP	0	6-301	None required
S7, Sulfur Melting Pit	TSP	0	6-301	None required
S8, New Sulfur Melting Pit	TSP	0	6-301	None required
S10, Alkylation Acid Storage Tank #11		0	6-301	None required
S11, Oleum Storage Tank #5	TSP	1.64 tpy	6-301	None required
S13, Alkylation Acid Storage Tank #16	TSP	0	6-301	None required
S16, Alkylation Acid Storage Tank #13	TSP	0	6-301	None required
S17, Railcar Loading/Unloading Station	TSP	0	6-301	None required
S18, Truck Unloading Station	TSP	0	6-301	None required
S20, West Truck Loading/Unloading Station	TSP	0.04 tpy	6-301	None required
S22, Sulfur Unloading Station	TSP	0.60 tpy	6-301	None required
S28, Sulfuric Acid Storage Tank #1	TSP	0	6-301	None required
S29, Sulfuric Acid Storage Tank #2	TSP	0	6-301	None required
S30, Sulfuric Acid Storage Tank #4	TSP	0	6-301	None required
S31, Sulfuric Acid Storage Tank #7	TSP	0	6-301	None required
S-32, Alkylation Acid / Sulfuric Acid Storage Tank #14	TSP	0	6-301	None required

Combustion Equipment, Plant #A0023

Source	Pollutant	Emissions tpy	FE Requirement	Monitoring
S9, Process Air Heater	TSP	0.05 tpy	SIP 6-301	None required
			BAAQMD 6-310	None required
	SO2	0.02 tpy	SIP 9-301	None required
			BAAQMD 9-1-302	None required
S15, Startup Air Heater	TSP	0.05 tpy	SIP 6-301	None required
			BAAQMD 6-310	None required
	SO2	0	SIP 9-301	None required
			BAAQMD 9-1-302	None required
	NOx	0	BAAQMD Cond. 7606, Part 3	None required
	CO	0.02	BAAQMD Cond. 7606, Part 4	None required

III. Facility Evaluations (continued)

2. U.S. Pipe and Foundry, Plant #A0083

a. Proposed Revisions, Plant #A0083

Standard Conditions: The standard condition for facilities subject to 112 (r) has been added.

Equipment List: Fuel data was added to S-1, Cupola, S-15, Annealing Oven, and A-3, Cupola Afterburner.

Pages 5, 17, 21, and 29: U.S. Pipe and Foundry has removed S-39, Ductile Treating Unit, from the plant. Therefore, all references to it in the Equipment List section, the Applicable Requirements Section, the Permit Conditions section and the Applicable Emission Limits and Compliance Monitoring Section have been removed.

Opacity Meters: All references to Regulation 6-302 have been deleted from the Applicable Requirements Section, the Applicable Emission Limits and Compliance Monitoring Section, and the Test Methods section because the District has not required that U.S. Pipe and Foundry install opacity meters.

General Applicable Requirements Table: The rules in this table have been changed to one-line citations. The specific citations for permitted sources have been added to the Source-Specific Applicable Requirements section.

Source-Specific Applicable Requirements Section: Specific requirements in Regulation 6, and Regulation 9, Rule 1 have been added to this section.

Table IV-F: Section 8-19-501, Records, was added to the S-17, Surface Coater, table.

Table IV-J: BAAQMD Regulation 12-4-301 has been changed from federally enforceable to non-federally enforceable.

Permit Conditions Section: All two-year recordkeeping requirements have been changed to five-years. The basis for this change, Regulation 2-6-501, was added. Condition #13321 has been corrected to read as originally written.

Applicable Emissions Limits & Compliance Monitoring Section: Requirements for Regulation 6, and Regulation 9, Rule 1 have been added to this section just as they have been added to Section IV.

Regulation 6, Particulate Matter and Visible Emissions, regulates Total Suspended Particulate. The emission limits in this section have been changed to TSP when the standard cited is Regulation 6.

The monitoring citation for Regulation 9-1-301 has been deleted in all cases because no monitoring is required unless specifically requested by the District's Air Pollution Control Officer.

In response to EPA's comment, the term N/S was deleted from all tables.

The tables have been changed to show existing monitoring at sources S1, S4, S5, and S8. The afterburner abating S1 has a temperature monitor and recorder. The baghouses abating S1, S4, S5, and S8 have pressure drop monitors.

A table has been added to show S-17, Surface Coater, emission limits and monitoring requirements.

Specific Tables in Section VII:

Table VII-B: The monitoring citation for condition #1783, Part 2, has been deleted because it is not a monitoring citation.

Table VII-D: The applicable requirement for sulfur dioxide for Table VI-D has been corrected from 9-1-304 to 9-1-302 because S-15, Annealing Oven, burns only natural gas.

Table VII-F: S-33 Gasoline Dispensing Facility (Non-Retail): The monitoring citation has been deleted because no monitoring is required.

b. Periodic Monitoring, Plant #A0083

Lack of periodic monitoring sufficient "to yield reliable data, etc." was one of the two main reasons for formally objecting to the District's permits. The District has agreed to add sufficient monitoring to the draft permits, but is reluctant to anticipate the final requirements in 40 CFR 64. In order to avoid future difficulties, we have decided to impose additional monitoring only in those cases where a source has large emissions and existing federally enforceable emission limits.

U.S. Pipe and Foundry appeared to have large emissions at S-1, Cupola, and S-17, Surface Coater.

S-17, Surface Coater, has emissions of 136 tpy VOC. U.S. Pipe and Foundry is obliged to keep weekly records of coating usage and monthly records of cleanup solvent usage pursuant to BAAQMD 8-19-501. This is sufficient monitoring for this source since there is no abatement device. A table for S-17 has been added to the Applicable Emission Limits and Compliance Monitoring Section.

S-1, Cupola, has no monitoring that is mandated by a regulation. It appeared to require additional monitoring because the District and U.S. Pipe and Foundry assumed that the emissions were 122 tpy SO2, based on the District's calculations. The District used an emission factor of 23.56 lb SO2/ton coke burned. This factor is based on a worst-case assumption that all of the sulfur was emitted as SO2. The AP-42 factor from Table 12-10-5 would be 16.8 lb SO2/ton coke burned based on an average sulfur content of 0.62%.

After receiving EPA's letter, U.S. Pipe and Foundry offered to perform a one-time test to determine the emission factor, and suggested resolving the periodic monitoring issue after the permit was issued. The District decided that it would be best if the District's Source Test group performed the source test immediately to resolve the

issues before the permit was issued.

The source test was performed on April 10, 1997. The SO2 results were extremely low, less than 1 ppm SO2/dscf (detectable level). U.S. Pipe and Foundry has submitted documentation, which is attached, that shows a less than 5 ppm level in 1988 (detectable level). On the basis of these source tests the District proposes no additional monitoring at this source due to the small magnitude of the emissions and to the large margin of compliance.

It is not intuitively obvious that a source burning about 10,000 tpy coke with an approximate sulfur content of 0.6% would have low SO2 emissions. The explanation given by U.S. Pipe and Foundry is that sulfur is removed during the melting process via the flux material (limestone) or slag. .

U.S. Pipe and Foundry has also submitted documentation, enclosed, that shows that the SO2 emissions at ductile treating sources are low. To achieve the low steel sulfur content, calcium carbide and magnesium ferrosilicon are added to the molten steel in series at S-4, Ductile Treating. Both the calcium carbide and magnesium combine with the sulfur to form a floating slag that is skimmed off at this process. This process is described in section 12.5 (Iron and Steel Production) of AP-42. However, AP-42 does not have an emission factor specifically for Hot Metal Desulfurization.

The tables for Sources S1, S4, S5, and S8 have been modified to show existing monitoring. This monitoring was included in the permit conditions in the first proposed permit.

In conclusion, the permit now more clearly shows the existing monitoring. Additional SO2 monitoring is not warranted due to the small magnitude of the emissions and to the large margin of compliance.

The details of the monitoring analysis for this facility are in presented on the tables in III.2.d. below.

c. Other Issues Raised in Comment letter of January 31, 1997, Plant #A0083

Schedule of Compliance: U.S. Pipe and Foundry was out of compliance with the obligation to get a permit for sources S-40 and S-41, Portable Abrasive Blasting Units, when the permit application was submitted in October, 1995. U.S. Pipe and Foundry applied for permits and received them on December 28, 1995. Therefore, the facility no longer needs a schedule of compliance to resolve this problem.

Compliance by Owner/Operator Rather than Emission Unit: Conditions #2274.5 and #2274.6 already have the owner/operator as the subject.

S-1, Cupola, and Regulation 9-1-304: The sulfur content of the coke used at S-1, Cupola, is not limited to 0.5% sulfur content. The sulfur content limitation is for liquid fuel. The requirement for solid fuel reads "…solid fuel of such sulfur content as would result in the emission of a gas stream containing more than 300 ppm (dry) of

sulfur dioxide…" The source test shows that the source is not exceeding the 300 ppm standard.

S-4, Ductile Treating, and Regulation 9-1-304: Regulation 9-1-304 was incorrectly cited for S-4. It has been corrected to 9-1-302, since S-4 is not considered a combustion source. The emission limit of 300 ppm is the same in both cases.

Alternate Operating Scenarios: Alternate operating scenarios have not been added to this permit because they are no longer valid. The use of S-39, Ductile Treating, is no longer possible because the source has been removed. The second scenario, use of LPG, is not necessary. The District considers LPG to be interchangeable with natural gas, and would not require an alternate operating scenario for its use.

d. Tables - U.S. Pipe & Foundry Emissions and Monitoring, Plant #A0083

Sulfur Dioxide Sources, Plant #A0083

Source	Pollutant	Emissions tpy	FE Requirement	Monitoring
S-1, Cupola	SO2	0 tpy	SIP 9-1-301	None required..
			SIP 9-1-304	None required..
S-4, Ductile Treating	SO2	0	SIP 9-1-301	None required..
			SIP 9-1-302	None required..
			BAAQMD Cond. #1783, part 1	None required..
S-15, Annealing Oven	SO2	0.02	SIP 9-1-301	None required
			SIP 9-1-302	None required..

Gasoline Dispensing Facility, Plant #A0083

Source	Pollutant	Emissions tpy	FE Requirement	Monitoring
S-33, Gasoline Dispensing Facility	VOC	0.33 tpy	BAAQMD 8-7-301.2	None required

Particulate Sources, Plant #A0083

Source	Pollutant	Emissions tpy	FE Requirement	Monitoring
S-1, Cupola	TSP	5.94 tpy	SIP 6-301,	None required
			BAAQMD 6-310, 311	None required
S-4, Ductile Treating Unit	TSP	1.11 tpy	SIP 6-301,	None required
			BAAQMD 6-310, 311	None required
S-5, Ladle Lancing	TSP	0	SIP 6-301,	None required
			BAAQMD 6-310, 311	None required
S-7, Mold Sandblast	TSP	0	SIP 6-301,	None required
			BAAQMD 6-310, 311	None required
S-8, Bell Blowout	TSP	0.04 tpy	SIP 6-301,	None required
			BAAQMD 6-310, 311	None required
S-15, Annealing Oven	TSP	0.13 tpy	SIP 6-301,	None required
			BAAQMD 6-310, 311	None required

Particulate Sources, Plant #A0083 (continued)

Source	Pollutant	Emissions tpy	FE Requirement	Monitoring
S-16, Pneumatic Cement Transport System	TSP	0.11 tpy	SIP 6-301,	None required
			BAAQMD 6-310, 311	None required
S-32, Pneumatic Dust Transport System	TSP	0.55 tpy	SIP 6-301,	None required
			BAAQMD 6-310, 311	None required
S-40, Portable Abrasive Blasting Unit #1	TSP	0.49 tpy	SIP 6-301,	None required
			BAAQMD 6-310, 311	None required
			SIP 12-4-301	None required
			BAAQMD 12-4-302	None required
S-41, Portable Abrasive Blasting Unit #2	TSP	0.02 tpy	SIP 6-301,	None required
			BAAQMD 6-310, 311	None required
			SIP 12-4-301	None required
			BAAQMD 12-4-302	None required

Lead Sources, Plant #A0083

Source	Pollutant	Emissions tpy	FE Requirement	Monitoring
S1, Cupola	Lead	0.3 tpy	BAAQMD 11-1-301, 302	None required
S4, Ductile Treating Unit	Lead	0	BAAQMD 11-1-301, 302	None required

III. Facility Evaluations (continued)

3. Acme Fiberglass, Plant #A0575

a. District Responses to U. S. EPA Comments Dated 1/31/97, Plant #A0575 (EPA comments in plain face type with quotation marks, District responses in italics)

Condition #12452 "Pursuant to §70.6(a)(3)(ii)(B), condition A.3 must be revised to require that all records be kept on site for a period of at least 5 years."

Done.

District Regulation 4 "If source has pre-planned abatement activities, as required by this rule, the plan should be cited or included."

Acme is not required to have a pre-planned abatement strategy by §4-301. Regulation 4 applies only in a very general manner to Acme (§4-304.2, 304.3, 305.2, and 305.4), as it applies to all "government, industrial and commercial" facilities.

District Regulation 5 "Note that only certain sections of this rule apply to (the) source, so only the applicable portions of the rule should be cited."

Regulation 5 also applies in a general manner to this facility, in that it applies to the whole District. As a general requirement, it has been listed in Table III, which will include citations to the rule level only.

District Regulation 6-301 "The table should note that this section was approved into the SIP on 6/2/80."

Table III previously did not include specific citations of the SIP version of applicable rules; instead the table footnote referred to the SIP and required compliance with SIP rules. The format for this table has been changed so that specific references to the SIP rules are included in the table (with the associated approval date); however, as stated in #2.b., section detail will not be included.

District Regulations 6-305 and 6-310 "Note that the exception 'except temporary sandblasting and open fires' is not consistent with the SIP rule which was approved on 6/2/80."

The column titled "Sources/Operations Covered" has been deleted. See also the response to #2.c. above.

Applicable Emission Limits "Note that all applicable emission limits must be included in the permit. This was not done for several Generally Applicable requirements, including District Regulation 8-3. Also, work practice standards must be specifically included (e.g. such as those in District Regulation 8-16)."

The general requirements in Table III include requirements that apply to exempt operations not listed on the permit and/or exempt operations not currently occurring at the facility, but which may occur without requiring a permit modification. These

requirements, only if specifically applicable to a permitted source or operation, are also included in Source-Specific Applicable Requirements of the permit and the emission limits in the Emission Limits and Compliance Monitoring Tables. Regulation 8-3 and 8-16 are not specifically applicable to any permitted sources at Acme.

Section IV - Applicable Requirements "Table IV-A lists District Regulation 8-50-220, a non-SIP definition, as an applicable requirement. Would applicability under the SIP provision be different? If so, both would apply. This must be clarified."

The permit does indicate that the BAAQMD Rule 8-50 standards and the SIP Rule 8-50 standards apply to Acme. The wording of these standards are exactly the same. The difference between the current BAAQMD standards and the SIP standards does not occur in the form of the standards, but in the definition of VOC, which is the only difference between the current District rule and the SIP rule. For this reason, BAAQMD §8-50-220 and SIP §8-50-220 definitions were included in the permit to highlight the difference in the applicability of the emission standards, as explained in the footnote on the permit.

The SIP §8-50-220, which defines VOC, was revised in response to EPA's delisting of certain compounds from the federal VOC definition; the current BAAQMD §8-50-220 now excludes acetone (among other compounds) from the VOC pollutant category. References to BAAQMD §8-50-220 and SIP §8-50-220 have been deleted from the permit.

Periodic Monitoring "The periodic monitoring requirements do not appear to be adequate. For example, recordkeeping does not appear to be adequate to demonstrate compliance with District Regulation 8-50-301.2."

§8-50-301.2 limits the weight loss from VOC emissions during polymerization of vapor-suppressed resins. The recordkeeping in §8-50-501.3 requires the facility to maintain the weight loss (g/m2) and monomer percentage data for each vapor suppressed resin used. This properties are characteristic of each type of resin and are obtained from the resin manufacturer. The District believes that maintenance of this data is adequate compliance monitoring for this type and size of source.

b. District Responses to U. S. EPA Comments Dated 3-17-97, Plant #A0575 (EPA comments in plain face type with quotation marks, District responses in italics)

"3. Suggested additions for periodic monitoring for Acme Fiberglass, ...

3.a. Even if compliance does not need to be determined on a regular basis, the permit should specify a means of determining compliance (e.g., test method), that the source/BAAQMD/EPA would use if we wanted to determine compliance. For example, for the resin limits, a method of determining VOC content of resin, and VOC emissions per surface area, should be provided."

Compliance determinations are required by the regulation and the permit; the frequency of these determinations is defined by the need to keep the current

records as stated in §8-50-501. Also, the proposed permit did specify the test methods for all emission limits listed in the Applicable Requirements section. The test methods were included in Section VII, Test Methods, of the proposed permit.

"3.b. For resin content limits, we would recommend either requiring that the source retain manufacturer records that demonstrate that each resin meets the emission standards, or that the source test upon use of each new resin."

Regulation 8-50 and the proposed permit do require that the facility maintain records that demonstrate compliance with the resin content limits. The recordkeeping requirements of the rule, §8-50-501.1 through 501.5, are listed in the Applicable Requirements section of the permit and are reiterated in the Applicable Emission Limits & Compliance Monitoring Requirements section.

"3.c. Table VI should also include 8-50-501.5, the daily recordkeeping requirement."

Table VI-A in the Applicable Emission Limits & Compliance Monitoring Requirements of the proposed permit does include the compliance monitoring requirements, §§8-50-501.2 and 501.3, which are the daily recordkeeping requirements. Section 8-50-501.5 does not specify what type of records must be maintained, but defines the minimum length of time that records must be retained. The District feels that the record retention requirement does not belong in Table VI-A, but in the Applicable Requirement section of the proposed permit, where it was listed.

"3.d. The source should have a method of demonstrating compliance with the 8-50-301.2 weight loss requirements. At a minimum a test method must be included in the permit. Additionally, the source could use the test to make an initial demonstration of compliance each time a new resin is used. In determining whether an initial test is adequate to demonstrate on-going compliance, it should be considered whether emissions would vary significantly with application methods or other conditions (temperature), and whether the initial test shows that emissions are near or above the limits."

Again, Test Method 23 for §8-50-301.2 and all other test methods for each emission limit were included in Section VII, Test Methods, of the proposed permit, and, as stated previously, the District feels that maintaining the manufacturer's specifications on-site is sufficient for this size and type of source.

III. Facility Evaluations (continued)

4. East Bay Municipal Utility District, Plant #A0591

a. Proposed Revisions, Plant #A0591

Permitted Source List: The fuels have been indicated for the 5 boilers and capacity information added for the gasoline dispensing facility.

Source-Specific Applicable Requirements for the Boilers, S-3 through S-6 and S-182:

- Regulation 6 and Regulation 9, Rule 1 requirements have been included in this section, in addition to being listed in the General Applicable Requirements section, as agreed in the general revisions applicable to all permits.
- The omission of the Regulation 9, Rule 7 requirements has been corrected.
- Condition #278, part 3 applies to the boilers S-3 through S-6, not the engines, so has been transferred from Table IV-B to Table IV-A.
- Condition #13844, part 1 has been deleted from the table for S-182. The usage limit was derived from the low usage exemption in Rule 9-7, but does not apply to this boiler due to its small size. The corresponding recordkeeping requirements have also been deleted and replaced with the recordkeeping associated with §9-7-304.

Source-Specific Applicable Requirements for the Engines, S-37, S-38, S-39:

- Regulation 6 and Regulation 9, Rule 1 requirements have been added.
- §9-8-301 has been deleted, since these engines do not burn fossil-derived fuel gas. §9-8-502 has also been deleted since it does not apply. The expired requirements in §9-8-401 and 501 have been deleted, as well as the effective date of 1-1-97. §§9-8-601 and 602 have been deleted, since the sections do not require testing, but only define approved test methods.
- The recordkeeping requirements of Condition #278 have been identified in this table.
- A new periodic monitoring requirement has been added to Condition #278 and has been listed in this table.

Source-Specific Applicable Requirements - Other Treatment Sources:

- Regulation 8, Rule 2 requirements have been included as specifically applicable.
- The basis previously identified for Condition #2409 was Regulation 1-301, which defines “negligent conduct” to be equivalent to 3 violation notices issued in a 30 day period. This has been corrected to reference Regulation 2-1-403, as Condition #2409 requires action by EBMUD upon receipt of more than 5 confirmed odor complaints by the District.

- Regulation 8, Rule 2 requirements have been included as specifically applicable.

Applicable Emission Limits & Compliance Monitoring Requirements for S-3 through S-6:

- Regulation 6 requirements have been included in this section. Compliance monitoring provisions have not been added for the federally enforceable emission limit in Regulation 6, since the boilers are an insignificant source of PM emissions. The potential to emit of each boiler is less than 1 tpy on either distillate or digester gas.

- Regulation 9-1-301, a general requirement, has been added. Monitoring provisions have not been added since the potential emissions are less than the proposed CAM threshold of 100 tpy. The potential emissions for each boiler are 2.83 tpy operated on digester gas; potential emissions on distillate oil at maximum capacity are 22.44 tpy.

Applicable Emission Limits & Compliance Monitoring Requirements for Engines:

- Regulation 6 requirements have been included in this section. Compliance monitoring provisions have not been added for the federally enforceable emission limit in Regulation 6, since the boilers are an insignificant source of PM emissions. The potential to emit of each engine on either 100% digester gas is 5.40 tpy and on distillate and digester gas is 4.62 tpy.

- Regulation 9-1-301, a general requirement, has been added. Monitoring provisions have not been added since the potential emissions using diesel and digester gas are 12.25 tpy and on digester gas alone are 7.30 tpy.

- A periodic monitoring requirement has been added for NOx and CO limits.

Applicable Emission Limits & Compliance Monitoring Requirements - Other:

- There are federally enforceable VOC limits that apply to the wastewater treatment sources and to the gasoline dispensing facility. As the VOC emissions from these sources are insignificant, no periodic monitoring has been proposed.

- No periodic monitoring has been proposed for the particulate and SO2 limits for the small boiler, S-182, as the potential emissions from the boiler are less than 1 tpy particulate and 7.89 tpy SO2.

Test Methods: The test methods have been defined for the emission limits added to the Emission Limits and Compliance Monitoring Tables.

Glossary: Definitions for the term “GLC” has been added.

b. District Responses to U. S. EPA Comments Dated 3-17-97, Plant #A0591 (EPA comments in plain face type with quotation marks, District responses in italics)

"Under the Operating Parameters in Table II-B, specify that the number of odor complaints received must be fewer than 5 per month, as specified under Condition #2409."

Done.

"Note that there is a typographical error under Condition #911.1. This condition should read 'user' rather than 'used.'"

This has been corrected.

"Public Notice: The public notice documents attached to your November 14, 1996 letter list the same mailing address for two different sources: EBMUD and Universal Foods."

This error has been noted. The District's legal staff has determined that a second public notice is not required.

III. Facility Evaluations (continued)

5. City of Sunnyvale, Plant #A0733

a. Proposed Revisions, Plant #A0733

Standard Conditions: The standard condition for facilities subject to 112(r) has been added.

Equipment List: Sources S14 and S15, Engine Generators, have been added. These engines are being installed at City of Sunnyvale and will be operational after June 15, 1997.

General Applicable Requirements Table: The rules in this table have been changed to one-line citations. The specific citations for permitted sources have been added to the Source-Specific Applicable Requirements section.

Source-Specific Applicable Requirements Section: Specific requirements in Regulation 6, Regulation 8, Rule 2, and Regulation 9, Rule 1 have been added to this section.

Table IV-B has been added for S14 and S15, Engine Generators. The new condition #10844 includes a requirement for periodic monitoring for the BACT NOX and CO limits.

Permit Conditions Section: Condition #10844 has been added as discussed in item 5 above.

Applicable Emissions Limits & Compliance Monitoring Section: Requirements for Regulation 6, Regulation 8, Rule 2 and Regulation 9, Rule 1 have been added to this section just as they have been added to Section IV.

Table VII-B: This table was added for sources S14 and S15, Engine Generators.

b. Periodic Monitoring, Plant #A0733

City of Sunnyvale has agreed to add periodic monitoring for the largest sources at the facility with federally-enforceable emission limitations. These sources are S14 and S15, Engine Generators.

The wastewater sources--S110-S170, are insignificant sources of emissions.

S12, Waste Gas Burner and S13, Digester Waste Gas Flare, are only subject to Regulation 6 and Regulation 9, Rule 1. They are used as backup to the exempt engines and will serve as backup to the new engines. These sources are not significant sources of emissions.

c. Alternate Operating Scenarios, Plant #A0733

City of Sunnyvale included an alternate operating scenario in its application. The District has decided not to include the scenario because it is unnecessary. As EPA

has pointed out in other jurisdictions, an alternate operating scenario is only appropriate when a facility can switch back and forth between one or more options. In this case, City of Sunnyvale is adding two engines to its facility. The facility does not intend to go back to the previous mode of operation after construction. The District has decided to include the engines in the permit with a future effective date, per City of Sunnyvale's request in their letter of April 4, 1997. The permit conditions have been modified to include periodic monitoring for the engines.

III. Facility Evaluations (continued)

6. Union Sanitary, Plant #A1209

a. Proposed Revisions, Plant #A1209

Standard Conditions: The standard condition for facilities subject to 112(r) has been added.

Equipment List: Fuel data was added to S-43, Hot Water Boiler.

General Applicable Requirements Table: The rules in this table have been changed to one-line citations. The specific citations for permitted sources have been added to the Source-Specific Applicable Requirements section.

Source-Specific Applicable Requirements Section: Specific requirements in Regulation 6, Regulation 8, Rule 2, and Regulation 9, Rule 1 have been added to this section.

- Tables IV-A and IV-C: Sections 9-8-401, 501, 502, 601, and 602 have been removed because they are not applicable.
- Table IV-A: A requirement for periodic monitoring for NOX and CO at S4, Reciprocating Engine, has been added. This requirement will become effective after Regulation 9, Rule 8, has been approved into the SIP.
- Table IV-C: A requirement for periodic monitoring for the NOX and CO BACT limits at S15, Reciprocating Engine, has been added.
- Table IV-D: Parts 1, 3, and 4 of Condition #389 have been deleted because Regulation 9, Rule 7, does not oblige boilers with a capacity below 10 mmbtu/hr to take a fuel throughput limitation. The condition has been renumbered.
- Table IV-E: Section 9-7-403 has been removed because it is no longer applicable.

Permit Conditions Section:

- Condition #14853 for periodic monitoring at S4, Reciprocating Engine, has been added. This requirement will become effective after Regulation 9, Rule 8, has been approved into the SIP.
- Condition #457 has been modified to include a condition for periodic monitoring at S15, Reciprocating Engine.
- All two-year recordkeeping requirements have been changed to five-years. The basis for this change--Regulation 2-6-501--was added.
- Condition #389 has been changed because Regulation 9, Rule 7, does not oblige boilers with a capacity below 10 mmbtu/hr to take a fuel throughput limitation. The condition has been renumbered.

Applicable Emissions Limits & Compliance Monitoring Section: Requirements for Regulation 6, Regulation 8, Rule 2 and Regulation 9, Rule 1 have been added to this section just as they have been added to Section IV.

- Table VII-A: BAAQMD Regulation 9, Rule 8, requirements were added to this table. The periodic monitoring provisions for Regulation 9, Rule 8, will only become effective after the rule is approved into the California SIP.
- Table VII-C: Periodic monitoring for the BACT NOX and CO limits have been added. These provisions are effective upon issuance of the permit.
- Table VII-E: The H2S limit for the digester gas inlet to S43 has been changed to show that the limit intends to control emissions of SO2. The existing monitoring for H2S has been added to this table. Also, the existing limit and monitoring of fuel usage has been added.

b. Periodic Monitoring, Plant #A1209

Lack of periodic monitoring sufficient "to yield reliable data, etc." was one of the two main reasons for formally objecting to the District's permits. The District has agreed to add sufficient monitoring to the proposed permits, but is reluctant to anticipate the final requirements in 40 CFR 64. In order to avoid future difficulties, we have decided to impose additional monitoring only in those cases where a source has large emissions and existing federally enforceable emission limits.

A review of Union Sanitary District's emissions shows that the sources with large emissions are the engines. Of the two engines, one, S15, has federally enforceable limits for NOX and CO. Union Sanitary District has agreed to annual source testing to fulfill the periodic monitoring requirement. An alternate monitoring plan option has been included in the permit condition to allow the facility to develop more frequent monitoring based on use of a portable monitor. Any change in the monitoring would undergo permit modification procedures pursuant to BAAQMD Regulation 2, Rule 6.

Periodic monitoring for the other engine, S4, has been included in the permit and will be effective as soon as Regulation 9, Rule 8, "NOX and CO from Stationary Internal Combustion Engines" is approved into the SIP.

Your comment letter of January 31, 1997, mentions lack of monitoring for digester gas use. The recordkeeping mentioned in the permit condition is the monitoring. A line for fuel usage has been added to Table VII-E to reflect the monitoring.

EPA's letter also mentions lack of monitoring of the H2S concentration in the digester gas. Again, the recordkeeping mentioned in the permit condition is the monitoring. Monthly H2S analysis and recordkeeping has been added to Table VII-E to reflect the monitoring.

The details of the monitoring analysis for all sources are in section III.6.c. of this Attachment

c. Tables - Union Sanitary Emissions and Monitoring, Plant #A1209

NOX, CO Sources

Source	Pollutant	Emissions tpy	FE Requirement	Monitoring
S15, Reciprocating Engine – Electrical Generator, Rich burn	NOX	136 tpy	BAAQMD Condition #457, Part 1	Annual source test or alternate monitoring plan
	CO	136 tpy	BAAQMD Condition #457, Part 2	Annual source test or alternate monitoring plan

SO2 Sources:

Source	Pollutant	Emissions tpy	FE Requirement	Monitoring
S4, Reciprocating Engine, Rich burn	SO2	0.01 tpy	SIP 9-1-301	None required
	SO2		BAAQMD 9-1-302	None required
S14, Waste Gas Burner (Industrial Flare); Digester Gas Fired	SO2	0 tpy	SIP 9-1-301	None required
	SO2		BAAQMD 9-1-302	None required
S15, Reciprocating Engine – Electrical Generator, Rich burn	SO2	0.63 tpy	SIP 9-1-301	None required
	SO2		BAAQMD 9-1-302	None required
S40, Hot Water Sludge Heating Boiler #4	SO2	0	SIP 9-1-301	None required
	SO2		BAAQMD 9-1-302	None required
S41, Hot Water Sludge Heating Boiler #5	SO2	0	SIP 9-1-301	None required
	SO2		BAAQMD 9-1-302	None required
S42, Waste Gas Burner #3 (Industrial Flare)	SO2	5.0 tpy	SIP 9-1-301	None required
	SO2		BAAQMD 9-1-302	None required
S43, Hot Water Boiler, (digester gas, natural gas)	SO2	0	SIP 9-1-301	None required
	SO2		BAAQMD 9-1-302	None required
	SO2		BAAQMD	Monthly H2S concentration analysis

			condition 9238, Part 3	and recordkeeping

Particulate Sources:

Source	Pollutant	Emissions tpy	FE Requirement	Monitoring
S4, Reciprocating Engine, Rich burn	TSP	0.05 tpy	SIP 6-301,	None required
	TSP		BAAQMD 6-310, 311	None required
S14, Waste Gas Burner (Industrial Flare); Digester Gas Fired	TSP	0.60 tpy	SIP 6-301,	None required
	TSP		BAAQMD 6-310, 311	None required
S15, Reciprocating Engine – Electrical Generator, Rich burn	TSP	0.02 tpy	SIP 6-301,	None required
	TSP		BAAQMD 6-310, 311	None required
S40, Hot Water Sludge Heating Boiler #4	TSP	0.02 tpy	SIP 6-301,	None required
	TSP		BAAQMD 6-310, 311	None required
S41, Hot Water Sludge Heating Boiler #5	TSP	0.02 tpy	SIP 6-301,	None required
	TSP		BAAQMD 6-310, 311	None required
S42, Waste Gas Burner #3 (Industrial Flare)	TSP	0.06 tpy	SIP 6-301,	None required
	TSP		BAAQMD 6-310, 311	None required
S43, Hot Water Boiler, (digester gas, natural gas)	TSP	0	SIP 6-301,	None required
	TSP		BAAQMD 6-310, 311	None required

POC Sources:

Source	Pollutant	Emissions tpy	FE Requirement	Monitoring
S100, Wastewater Treatment Plant	POC	4 tpy	BAAQMD 8-2-301	None required
S-101, Gasoline Dispensing Facility	VOC	4.5 tpy PTE	BAAQMD 8-7-301.2	None required
S110, Preliminary Treatment	POC	0	BAAQMD 8-2-301	None required
S111, Preliminary Treatment,	POC	0	BAAQMD	None required

3 Barscreens			8-2-301	
S120, Primary Treatment	POC	0	BAAQMD 8-2-301	None required
S130, Secondary Treatment	POC	0	BAAQMD 8-2-301	None required
S131, Secondary Treatment	POC	0	BAAQMD 8-2-301	None required
S135, Secondary Treatment, INKA Process	POC	0	BAAQMD 8-2-301	None required
S140, Secondary Treatment; Clarifiers	POC	0	BAAQMD 8-2-301	None required
S145, Secondary Treatment, INKA Clarifiers	POC	0	BAAQMD 8-2-301	None required
S150, Disinfection	POC	0	BAAQMD 8-2-301	None required
S160, Sludge Handling Processes	POC	0	BAAQMD 8-2-301	None required
S161, Sludge Handling – Gravity Thickeners	POC	0	BAAQMD 8-2-301	None required
S162, Sludge Handling - Solids Handling Building	POC	0	BAAQMD 8-2-301	None required
S163, Sludge Handling – Pumping Station	POC	0	BAAQMD 8-2-301	None required
S164, Sludge Handling – Gravity Belt Thickeners	POC	0	BAAQMD 8-2-301	None required
S165, Water Reclamation	POC	0	BAAQMD 8-2-301	None required
S170, Anaerobic Digester	POC	0	BAAQMD 8-2-301	None required

III. Facility Evaluations (continued)

7. City of Santa Rosa, Plant #A1403

a. Proposed Revisions, Plant #A1403

Standard Conditions: The standard condition for facilities subject to 112(r) has been added.

Equipment List: Fuel data was added to S-28, Hot Water Boilers, and S29, S30, S31, Internal Combustion Engines. The engines are undergoing a retrofit that will be complete after 6/15/97. The horsepower will be boosted to 1150 hp.

General Applicable Requirements Table: The rules in this table have been changed to one-line citations. The specific citations for permitted sources have been added to the Source-Specific Applicable Requirements section.

Source-Specific Applicable Requirements Section: Specific requirements in Regulation 6, Regulation 8, Rule 2, and Regulation 9, Rule 1 have been added to this section.

Table IV-A for S29, S30, and S31 has been changed because the sources--S29, S30, S31, Internal Combustion Engines—have been retrofitted to increase their capacity and to meet the requirements of BAAQMD Regulation 9, Rule 8. These engines will have a new condition, #11031, that will become effective after June 15, 1997. The new condition adds a NOx limit but allows City of Santa Rosa to run all the engines at once. A requirement for periodic monitoring for NOx at S29, S30, S31, Internal Combustion Engines, has been added to Condition #11031. This requirement will become effective after June 15, 1997, along with the rest of the condition. City of Santa Rosa requested that the engines be added to the permit before construction was complete because the proposed minor modification procedures had been deleted from the permit due to EPA's request. City of Santa Rosa was concerned that there would be difficulties in modifying the Title V permit after it was issued. A requirement for periodic monitoring for CO has also been added. It will become effective when Regulation 9, Rule 8 is approved into the California SIP.

Permit Conditions Section: Condition #11031 has been added as discussed in item 5 above.

Permit Conditions Section: All two-year recordkeeping requirements have been changed to five-years. The basis for this change--Regulation 2-6-501--was added.

Applicable Emissions Limits & Compliance Monitoring Section: Requirements for Regulation 6, Regulation 8, Rule 2 and Regulation 9, Rule 1 have been added to this section just as they have been added to Section IV.

Table VII-D: This table was modified to make the changes discussed in Item 5 above. The periodic monitoring provisions for Regulation 9, Rule 8, will only become effective after the rule is approved into the California SIP.

b. Periodic Monitoring, Plant #A1403

City of Santa Rosa has agreed to add periodic monitoring for the largest sources at the facility with federally-enforceable emissions. These sources are S29, S30, S31, Internal Combustion Engines. These sources previously had no federally enforceable conditions. City of Santa Rosa submitted Application #12196 requesting review of the modifications necessary to comply with Regulation 9, Rule 8, and also requesting deletion of the hours of operation limit. The Authority to Construct was issued on April 12, 1994 and included a new NOx limit. City of Santa Rosa has agreed to perform an annual source test for NOx for each engine. If Regulation 9, Rule 8 is approved into the SIP, City of Santa Rosa will also test for compliance with the CO limit.

The other sources; S17, S18, S100-S190, Wastewater Treatment Plant; S28, Hot Water Boilers, and S3-S5, Compost Operations; are insignificant sources of emissions.

c. Alternate Operating Scenarios, Plant #A1403

City of Santa Rosa proposed an alternate operating scenario in its application. However, the District has decided not to include the scenario because it is unnecessary. As EPA has pointed out in other jurisdictions, an alternate operating scenario is only appropriate when a facility can switch back and forth between one or more options. In this case, City of Santa Rosa is modifying its facility to comply with the NOx RACT rule, and to increase capacity at the wastewater treatment plant. The facility will not be able to go back to the previous mode of operation after completion. The District has decided to include the portion with the increased emissions—the engine upgrade—in the permit with a future effective date. The modifications to the Wastewater plant will not be mentioned because the emissions will not change materially, and the source descriptions will not change.

III. Facility Evaluations (continued)

8. Fleischmann's Yeast, Plant #A2300

a. Proposed Revisions, Plant #A2300

Equipment List: The fuels have been indicated for the two boilers and steam heat indicated for the yeast dryer.

Source-Specific Applicable Requirements - Boilers:

- Regulation 6 and Regulation 9-1 requirements have been included in this section, in addition to being listed in the General Applicable Requirements section.
- Since the facility's District-approved compliance plan for S-1 is §9-7-304.2, §§9-7-304.1 and 304.3 have been deleted and the emission limits in §§304.1 and 304.3 also deleted from the Applicable Emission Limits & Compliance Monitoring Requirements section.
- §9-7-403 has been deleted, since the requirement has expired.
- §§9-7-601, 602, and 605 have been deleted, since the sections do not require testing, but only define approved test methods.

Source-Specific Applicable Requirements - Yeast Dryer and Fermenters:

- Regulation 6 requirements have been included.
- Pursuant to the facility's comment during the public notice period, the description of Condition #13149, part 3c has been corrected to "VOC instrument calibration records."

Permit Conditions:

- Asterisks have been added to the non-federally enforceable conditions.
- The footnotes to Condition #13149 were included in the proposed permit to clarify the fact that the condition, which was imposed through the District's NSR program, is not federally enforceable with respect to hazardous air pollutants. The District has deleted the footnotes, pursuant to the facility's request.

Applicable Emission Limits & Compliance Monitoring Requirements for S-1:

- Condition #12681, part 1 has been added to this section.
- Regulation 6 requirements have been included. Compliance monitoring provisions have not been added for the federally enforceable emission limit in Regulation 6, since the boilers are an insignificant source of PM emissions. This boiler is a back-up boiler, yet worst case emissions are only 2.3 tpy, assuming 100% fuel oil use at maximum capacity.

- Regulation 9-1-301, a general requirement, has been added. Potential emissions of SO2 are 83.35 tpy, based on 100% fuel oil use at maximum capacity with a sulfur content of 0.5%. When Regulation 9-7 is approved into the SIP (proposed on 4-17-97), the limits of that rule, including the low usage exemption, will become federally enforceable; at that time, the facility will be subject to a federally enforceable limit of 89,000 therms/year and the potential SO2 emissions will drop to 2.29 tpy. The District proposes no periodic monitoring for SO2.

- Regulations 9-7-301.1, 301.2, 302.1, 302.2, and 303 have been deleted, as they apply to S-2, not to S-1. The Regulation 9, Rule 7 limits are not federally enforceable at this time and not subject to periodic monitoring requirements. However, the District proposes that, when the requirements become federally enforceable, no periodic monitoring will be necessary, as the worst case emissions are less than 100 tpy (23 tpy NOx and 6 tpy CO, assuming 100% fuel oil use at maximum capacity and using uncontrolled emission factors from AP-42, 5th Edition).

Applicable Emission Limits & Compliance Monitoring Requirements for S-2:

- Condition #260 has been added to this section. As this condition is federally enforceable, it is subject to periodic monitoring requirements. The District proposes the addition of periodic monitoring in the form of (1) daily fuel oil use and (2) vendor fuel oil sulfur content certification records.

- Regulation 6 requirements have been included. Compliance monitoring provisions have not been added, since the boilers are an insignificant source of PM emissions. Worst case emissions are 3.1 tpy, assuming 100% fuel oil use at the maximum capacity of the boiler.

- Regulation 9-1-301 has been added. The records proposed above demonstrate compliance with Condition #260, and the usage and sulfur content limits in Condition #260 restrict potential SO2 emissions to 28.3 tpy. As this level of emissions is less than the 100 tpy threshold proposed in the CAM rule, the District proposes no additional periodic monitoring for SO2.

- Regulations 9-7-301.1, 301.2, 302.1, 302.2, and 303 have been added. As the Regulation 9, Rule 7 limits are not federally enforceable at this time, the District has not proposed additional periodic monitoring. The District also proposes that, when the requirements become federally enforceable, no periodic monitoring will be necessary, as the worst case emissions are 29 tpy NOx and 7 tpy CO, assuming 100% fuel oil use at maximum capacity and using uncontrolled emission factors from AP-42, 5th Edition)

Applicable Emission Limits & Compliance Monitoring Requirements - Yeast Dryer and Fermenters: Regulation 6 requirements have been included in these tables.

- Particulate matter compliance monitoring provisions have not been proposed for the Yeast Dryer. The dryer is equipped with a wet cyclone scrubber, which is

especially effective for this process due to the behavior of the yeast when wetted, as indicated by source test results of 0.00215 gr/dscf (maximum of 3 runs). Due to the large margin of compliance between the measured emissions and the federally enforceable emission limit of 0.01 gr/dscf, the District does not believe periodic monitoring provisions are warranted.

- Monitoring provisions have not been added to the fermenters, since the estimated PM emissions from each fermenter are less than 1 tpy, based upon the source test results for this source category and assuming continuous operation.

Test Methods: The test methods have been defined for the added emission limits Regulation 6 and Condition #206, part 3.

Glossary: Definitions for the terms "AB2588," "RACT," and "RMP" have been added.

b. District Responses to U. S. EPA Comments Dated 3-17-97, Plant #A2300 (EPA comments in plain face type with quotation marks, District responses in italics)

"The pollutants (POC and acetaldehyde) identified for all the fermenters listed in Table VI-D are not consistent with the pollutant (VOC) listed under Conditions A.1. and A.3. in Section V - Permit Conditions. Please make the requirements consistent."

Done.

"Table VI-B for steam boiler #2 does not include the monitoring frequency for SO2 emission compliance. Please include a monitoring frequency requirement."

The monitoring frequency has been indicated in the revised permit.

III. Facility Evaluations (continued)

9. Universal Foods (Red Star Yeast), Plant #A3523

a. Proposed Revisions, Plant #A3523

Equipment List: The fuels have been indicated for the two boilers.

General Applicable Requirements: Regulation 11-10, which applies to the exempt cooling towers, has been added.

Source-Specific Applicable Requirements - Boilers:

- Regulation 6 requirements have been included in this section, in addition to being listed in the General Applicable Requirements section.
- Regulation 9-1-301, a general requirement, has been added.
- Since the facility's approved compliance plan is §9-7-304.2, §§9-7-304.1 and 304.3 have been deleted and the emission limits in §§304.1 and 304.3 not included in the Applicable Emission Limits & Compliance Monitoring Requirements.
- §9-7-403 has been deleted, since the requirement has expired.
- §§9-7-601, 602, and 605 have been deleted, since the sections do not require testing, but only define approved test methods.

Source-Specific Applicable Requirements - Fermenters: Regulation 6 requirements have been included in this section, in addition to being listed in the General Applicable Requirements section.

Permit Conditions: Asterisks have been added to the non-federally enforceable conditions.

Applicable Emission Limits & Compliance Monitoring Requirements - Boilers:

- Regulation 6 requirements have been included in this section. Compliance monitoring provisions have not been added for the federally enforceable emission limit in §6-310, since the boilers are an insignificant source of PM emissions with worst case emissions of less than 0.5 tpy, assuming 100% fuel oil use at maximum capacity.
- Regulation 9-1-301, a general requirement, has been added. Compliance monitoring provisions have not been added for the federally enforceable emission limits in Regulation 9-1, since the worst case SOx emissions from the boilers are 28 tpy (assuming 100% fuel oil use and the highest sulfur content value in AP-42) which is substantially less than the 100 tpy threshold in the proposed CAM rule.
- Condition #1993, parts 1 and 3, have been added to this table. Part 3 has associated compliance monitoring provisions. Part 1 limits sulfur content in the fuel oil; compliance monitoring has not been added for the reason discussed above.

Applicable Emission Limits & Compliance Monitoring Requirements - Fermenters: Regulation 6 requirements have been included in this section. Compliance monitoring provisions have not been added for the federally enforceable limit in §6-310, since the estimated PM emissions from each fermenter are less than 1 tpy, based upon the source test results supplied with the MFR application and assuming continuous operation.

Test Methods: The test methods have been defined for the added emission limits in §§6-301, 6-310, 9-1-301, and Condition #1993, part 1.

Glossary: Definitions for the terms “AB2588,” “RACT,” and “RMP” have been added.

10. Western Fiberglass, Plant #A7974

a. Proposed Revisions, Plant #A7974

Equipment List: The abatement device list table was revised to the correct format.

Source-Specific Applicable Requirements:

S-1, Filament Winder

- The definition of "VOC" has been deleted. See the letter accompanying the Acme Fiberglass permit.
- Regulation 8-50-306 applies specifically to resin baths and has therefore been added to this table.
- The basis for each permit condition has been corrected in this section and in the Permit Conditions Section.

S-2, Closed Mold Vacuum

- The definition of "closed mold" and "VOC" have been deleted.
- As the facility complies with §8-50-301 through use of a closed mold as specified in §8-50-301.3, the resin content requirements of §301.1 and §301.2 have been deleted, and §8-50-301.3 has been added. These corrections have also been made to the Emission Limits and Compliance Monitoring Section.
- The basis for each permit condition has been corrected in this section and in the Permit Conditions Section.

S-3, Chopper Guns

- Regulation 6 requirements have been included as specifically applicable in this section, since the spraying operation is not enclosed by a booth.
- The definition of "VOC" has been deleted.
- The basis for each permit condition has been corrected in this section and in the Permit Conditions Section.
- Condition #9303, part 13 has been deleted. The condition was erroneously identified as a BACT requirement, but had actually been imposed due to the facility's request that the two spray guns be permitted as a single source. Current policy allows a spray booth with multiple guns to be issued a single permit without restricting simultaneous use of multiple guns, therefore this condition has been deleted from Western Fiberglass' permit. Note that the deletion has no impact on the emission limits in the permit.

Applicable Emission Limits & Compliance Monitoring Requirements:

- Where Condition #9303 allows the facility to comply with either a usage limit or an emission limit, both options have been identified in this section.
- Regulation 6 requirements have been included in this section. Compliance monitoring provisions have not been added for the federally enforceable opacity limit in Regulation 6, since the visible emissions from the spraying operations have never been significant.

All other federally enforceable emission limits have associated compliance monitoring provisions. See the evaluation for the Acme Fiberglass permit.

Enclosure #3 Proposed Major Facility Review Permits

BAAQMD Plant #	Plant Name
A0023	General Chemical
A0083	U.S. Pipe & Foundry
A0575	Acme Fiberglass
A0591	East Bay M.U.D.
A0733	City of Sunnyvale
A1209	Union Sanitary
A1403	City of Santa Rosa
A2300	Fleischmanns Yeast
A3523	Universal Foods
A7974	Western Fiberglass

Revised by the Bay Area Air Quality Management District

Pursuant to Comments by U. S. EPA Region IX Dated January 31, 1997

Enclosure #4

Source Test Results

U.S. Pipe and Foundry, Plant #A0083